

The Honorable Tana Lin

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

MICROSOFT CORPORATION, a
Washington corporation,

Plaintiff,

v

THE SEARCH PEOPLE ENTERPRISES
LTD., a British Columbia, Canada,
corporation; MEHTABJIT SINGH TEJA, aka
RONNIE TEJA, an individual; and DOES 1–
10,

Defendants.

Case No. 2:22-cv-01113-TL

**STIPULATION BETWEEN THE
PARTIES REGARDING EXTENSION
OF THE DISCOVERY DEADLINE TO
TAKE DEPOSITIONS OF DENIS
ZOGOVIC, MEHTABJIT SINGH
TEJA, AND THE SEARCH PEOPLE
ENTERPRISES LTD. AND
~~PROPOSED~~ ORDER**

**NOTE ON MOTION CALENDAR:
January 15, 2025**

STIPULATION RE DEPOSITIONS OF
DENIS ZOGOVIC, MEHTABJIT SINGH
TEJA, AND TSPE - Page 1
Case No. 2:22-cv-01113-TL

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Defendants The Search People Enterprises Ltd. (“TSPE”) and Mehtabjit Singh Teja, aka Ronnie Teja (“Teja”) (collectively, “Defendants”) and Plaintiff Microsoft Corporation (“Plaintiff”) (Defendants and Plaintiffs collectively, “The Parties”) stipulate as follows:

I. RECITALS

1. Pursuant to the Order Resetting Bench Trial Date and Related Dates (Dkt. No. 43), fact discovery in this matter is to be completed by February 3, 2025.

2. Plaintiff served Defendants with a notice to take the deposition of Denis Zogovic, TSPE’s Operations Manager, on January 27, 2025, with depositions of TSPE and Teja following shortly thereafter.

3. TSPE recently learned that Mr. Zogovic, who resides in Europe, is experiencing an ongoing medical issue that will likely affect his ability to testify in this matter. Mr. Zogovic has a medical appointment scheduled for the morning of January 27, 2025 and expects surgery to be scheduled for a future date at that appointment. However, Mr. Zogovic does not know when the surgery will be scheduled for.

4. Plaintiff would like to maintain the order of the deposition schedule, with Mr. Zogovic being deposed prior to TSPE and Teja.

II. STIPULATION

5. Given Mr. Zogovic’s medical issue and Plaintiff’s case strategy concerns, the Parties stipulate to allow Plaintiff to depose Mr. Zogovic, TSPE, and Mr. Teja after the February 3, 2025 discovery cutoff. The Parties will meet and confer and set new dates for these depositions. The Parties further agree to have the depositions take place in February 2025, assuming Mr. Zogovic is able to have the surgery and is recovered in time for such depositions to occur in that month.

III. GOOD CAUSE STATEMENT

6. A party may obtain relief from the discovery cutoff date by demonstrating good cause for allowing further discovery. Fed. R. Civ. P. 16(b)(4).

7. The Parties demonstrate good cause for allowing these depositions to occur after the

discovery cutoff. The Parties have been diligent in coordinating these depositions, but have been unexpectedly impacted by Mr. Zogovic's medical issue. Therefore, the Parties respectfully request that the Court to grant this stipulation between the Parties, which is limited only to these three depositions.

8. Defendants reserve the right to seek further changes to the discovery schedule depending upon how the Court rules at the upcoming January 21, 2025 hearing in this matter.

DATED: January 15, 2025

HANSEN LAW FIRM, P.C.
Attorney for Defendants, The Search People
Enterprises Ltd. and Mehtabjit Singh Teja, aka
Ronnie Teja

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DATED: January 15, 2025

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ORDER

Based on the foregoing, IT IS SO ORDERED.

DATED: January 16, 2025



Tana Lin
United States District Judge